

From: Mia, Marcia [Mia.Marcia@epa.gov]
Sent: 2/15/2017 6:22:52 PM
To: Ostrand, Laurie [Ostrand.Laurie@epa.gov]
CC: North, Alexis [North.Alexis@epa.gov]; Law, Donald [Law.Donald@epa.gov]
Subject: RE: Voluntary Compliance with NSPS OOOO for equipment leaks of VOC

A small typo.

Ex. 5 Deliberative Process (DP)

In red.

Marcia B Mia
Office of Compliance/Air Branch
2227A WJCS
U.S. Environmental Protection Agency
202-564-7042

From: Ostrand, Laurie
Sent: Wednesday, February 15, 2017 11:51 AM
To: Mia, Marcia <Mia.Marcia@epa.gov>
Cc: North, Alexis <North.Alexis@epa.gov>; Law, Donald <Law.Donald@epa.gov>; Ostrand, Laurie <Ostrand.Laurie@epa.gov>
Subject: FW: Voluntary Compliance with NSPS OOOO for equipment leaks of VOC

Hi Marcia

This is what I intend to tell the state. Let me know if you have any concerns.

Hey DJ – thought you might be interested in this issue since it's a permitting question CDPHE raised to Alex.

Question:

CDPHE indicated that they are addressing a permitting action where a gas plant is subject to both NSPS KKK and NSPS OOOO and that the operator is requesting to electively comply with requirements of NSPS OOOO for both processing trains (to avoid the complexities of monitoring and reporting per two separate standards). CDPHE indicated that since NSPS OOOO contains more stringent requirements, it would seem like an acceptable request. However, CDPHE also recognized that since this "elective compliance with OOOO" is not explicitly allowed in the rule (NSPS KKK), and questioned whether the operator had to apply to EPA to use OOOO as an "alternative means of emission limitation" for the components subject to KKK (per § 60.632(c)). CDPHE also asked if there was a more streamlined approach to allow for compliance with OOOO in place of KKK for equipment leak standards. Additionally, CDPHE also indicated that they were hoping for a broader pronouncement by EPA stating that NSPS OOOO/OOOOa would be at least as stringent as every requirement of NSPS KKK, so that instead of petitioning the EPA for every permit where an operator would prefer to follow NSPS OOOO in order to not have mixed applicability of NSPS KKK for older parts of their fugitives and NSPS OOOO for newer parts, that there could be a streamlined process of simply allowing the operator to meet the more stringent rule.

Response:

Ex. 5 Deliberative Process (DP)